

SHARON GILBERT TIMM, ESQUIRE

Attorney I.D. 77778

Penn's Court, Suite 111

350 South Main Street

Doylestown, PA 18901

(215) 489-0179

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATRINA WILLIAMS-McCOY

Plaintiff,

v.

STARZ ENCORE GROUP

a/k/a **ENCORE MEDIA COMPANY**

Defendant.

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CIVIL ACTION

No. 02-CV-5125

JURY TRIAL DEMANDED

ORDER

AND NOW, this day of , 2003, upon
consideration of Defendant's Motion for Summary Judgment and Plaintiff's response thereto, it
is hereby ORDERED and DECREED that said motion is DENIED.

BY THE COURT,

J.

SHARON GILBERT TIMM, ESQUIRE

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATRINA WILLIAMS-McCOY	:	CIVIL ACTION
Plaintiff,	:	
	:	No. 02-CV-5125
v.	:	
	:	
STARZ ENCORE GROUP	:	JURY TRIAL DEMANDED
a/k/a ENCORE MEDIA COMPANY	:	
Defendant.	:	

**PLAINTIFF'S ANSWER TO DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

AND NOW, this day of September, 2003, comes Plaintiff by and through counsel, and respectfully requests this Honorable Court to enter an Order denying Defendant's Motion for Summary Judgment for the following reasons:

1. Admitted.
2. Denied. It is denied that Plaintiff cannot establish a prima facie case of race discrimination and cannot show that Defendant's legitimate non-discriminatory reason is pretextual. Because there are genuine issues of material fact, this case must go forward to a jury for resolution of the dispute between the parties.

WHEREFORE, Plaintiff respectfully requests this Court enter an Order denying Defendant's Motion for Summary Judgment.

Date: _____

Sharon Gilbert Timm, Esquire
Attorney for Plaintiff

SHARON GILBERT TIMM, ESQUIRE

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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATRINA WILLIAMS-McCOY

Plaintiff,

v.

STARZ ENCORE GROUP

a/k/a **ENCORE MEDIA COMPANY**

Defendant.

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CIVIL ACTION

No. 02-CV-5125

JURY TRIAL DEMANDED

CERTIFICATE OF SERVICE

I, Sharon Gilbert Timm, Esquire, hereby certify that a true and correct copy of Plaintiff's Answer to Defendant's Motion for Summary Judgment, accompanying Memorandum of Law and Plaintiff's Answer to Defendant's Statement of Uncontested Facts was sent via first-class postage prepaid mail upon the following on the date shown below:

David H. Stacy, Esquire
Elzi Pringle Gurr & Stacy
950 17th Street, Suite 1875
Denver, CO 80202

Kristin Blanchard, Esquire (excl. exhibits)
Montgomery McCracken Walker & Rhoads
123 Broad Street, Avenue of the Arts
Philadelphia, PA 19109

Date: _____

Sharon Gilbert Timm, Esquire
Attorney for Plaintiff